

KINGSLEY & KINGSLEY, APC

ERIC B. KINGSLEY, Esq., Cal. Bar No. 185123

eric@kingsleykingsley.com

KELSEY M. SZAMET, Esq., Cal. Bar No. 260264

kelsey@kingsleykingsley.com

16133 Ventura Blvd., Suite 1200

Encino, CA 91436

Telephone: (818) 990-8300

Fax: (818) 990-2903

DAVTYAN PROFESSIONAL LAW CORPORATION

EMIL DAVTYAN, Esq., Cal. Bar No. 299363

emil@davtyanlaw.com

5959 Topanga Canyon Blvd. Suite 130

Woodland Hills, California 91367

Telephone: (818) 992-2935

Fax: (818) 975-5525

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA RICHARD, an individual,
on behalf of herself and others similarly
situated

Plaintiff,

v.

THE LELAND STANFORD JUNIOR
UNIVERSITY; and DOES 1 thru 50,
inclusive

Defendant.

CASE NO. 5:18-cv-06611

**JOINT STIPULATION OF
DISMISSAL PURSUANT TO
RULE 41(a)(1)(A)(II) OF THE
FEDERAL RULES OF CIVIL
PROCEDURE**

[The Honorable Nathanael Cousins]

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, plaintiff THERESA RICHARD ("Plaintiff") and defendant THE LELAND STANFORD JUNIOR UNIVERSITY (collectively, the "Parties"), stipulate to voluntarily dismiss, with prejudice, each and every allegation, cause of action, claim and prayer for relief asserted in this action as to, and on behalf of, Plaintiff.

STIPULATION OF DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii)



1 The Parties further stipulate to dismiss, without prejudice, each and every
2 allegation, cause of action, claim and prayer for relief asserted in this action on
3 behalf of each member of the Proposed Class which is defined in paragraph 36 of
4 the complaint as:

5 all persons in the United States who filled out Defendant's standard
6 application form permitting Defendant to obtain a consumer report verifying
7 the applicant's background and experience at any time during the period
8 beginning five (5) years prior to the filing of this Complaint and ending on
9 the date as determined by the Court (the "Proposed Class").

10 Dismissal on behalf of the Proposed Class is warranted because the
11 allegations, causes of action, claims and prayers for relief are being dismissed
12 without prejudice.

13 In agreeing to this stipulation, counsel for Plaintiff is not aware of any person
14 who is relying on the pendency of this action to protect their interests.

15
16 DATED: April 12, 2019

KINGSLEY & KINGSLEY, APC

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18 By: /s/ Kelsey M. Szamet

19 Eric B. Kingsley
20 Kelsey M. Szamet
21 Attorneys for Plaintiff

22 DATED: April 12, 2019

GORDON & REES, SCULLY
MANSUKHANI LLP

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25 By: /s/ Edward Romero

26 Edward Romero
27 Kelsey M. Szamet
28 Attorneys for Defendant

1 **ATTESTATION REGARDING SIGNATURES**

2 I attest that concurrence in the filing of the document has been obtained
3 from each of the other Signatories, which shall serve in lieu of their signatures on
4 the document.

5 /s/ Kelsey M. Szamet
6 KELSEY M. SZAMET
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